

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA

ALFREDO BELTRAN; DANIEL WANNER;	:	
and BETTER DAYS AHEAD OUTREACH	:	
INC.	:	
	:	Case No. 2:23-cv-04234
Plaintiffs,	:	
	:	JURY TRIAL DEMANDED
vs.	:	
	:	
BOROUGH OF POTTSTOWN,	:	
	:	
Defendant.	:	

**MOTION TO EXCEED PAGE LIMIT**

Plaintiffs Alfredo Beltran, Daniel Wanner, and Better Days Ahead Outreach, Inc., by and through their attorneys, respectfully seek to file a brief in support of their Motion for Preliminary Injunction that exceeds fifteen pages in length. In support thereof, Plaintiffs state as follows:

1. Plaintiffs filed a Complaint seeking declaratory and injunctive relief on November 1, 2023. *See* Dkt. 1.
2. On November 2, 2023, Plaintiffs moved for a preliminary injunction. *See* Dkt. 4.
3. In support thereof, Plaintiffs seek permission to file a brief in excess of fifteen pages.
4. Plaintiffs seek this permission because Plaintiffs' Motion for Preliminary Injunction cuts to core factual and merits issues in this case.
5. Without intervention from this Court, Defendant's proposed action challenged by Plaintiffs will take place on December 1, 2023.
6. To ensure that the Court has all of the necessary factual and legal background to decide Plaintiffs' Motion for Preliminary Injunction before December 1, 2023, Plaintiffs seek to file a brief up to twenty-three pages in length.

7. Due to the emergency nature of the relief requested, Plaintiffs' proposed brief is attached.

Respectfully submitted,

/s/ Marielle Macher

Date: Nov. 2, 2023

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	:	
Defendant.	:	

**[PROPOSED] ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2023, Plaintiffs' Motion to Exceed  
Page Limit is granted. Plaintiffs may file a brief in support of their Motion for Preliminary  
Injunction that is up to twenty-three pages in length.

**BY THE COURT:**

\_\_\_\_\_  
**J.**

**CERTIFICATE OF SERVICE**

I, Marielle Macher, Esq. hereby certify that a true and correct copy of the foregoing Motion to Exceed Page Limit was e-mailed to counsel for Defendant Borough of Pottstown at the following contact information:

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Date: Nov. 2, 2023

/s/ Marielle Macher

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